From:	MCCLINCY Matt
To:	MCCLINCY Matt; Eric Blischke/R10/USEPA/US@EPA; Burt Shephard/R10/USEPA/US@EPA; Chip Humphrey/R10/USEPA/US@EPA; Curt Black/R10/USEPA/US@EPA; Dana Davoli/R10/USEPA/US@EPA; GAINER Tom; Gina Grepo-Grove/R10/USEPA/US@EPA; jeff.baker@grandronde.org; PETERSON Jenn L; jeremy_buck@fws.gov; ANDERSON Jim M; Joe Goulet/R10/USEPA/US@EPA; Judy Smith/R10/USEPA/US@EPA; TOEPEL Kathryn; Kristine Koch/R10/USEPA/US@EPA; howp@critfc.org; POULSEN Mike; Rene Fuentes/R10/USEPA/US@EPA; Robert.Neely@noaa.gov; Sean Sheldrake/R10/USEPA/US@EPA; tomd@ctsi.nsn.us; parker.wittman@eiltd.net; csmith@parametrix.com; rgensemer@parametrix.com; rose@yakama.com; erin.madden@gmail.com; Ron.Gouguet@noaa.gov; cinde.donoghue@eiltd.net; jay.field@noaa.gov; jennifer.arthur@EILTD.net; chris.thompson@EILTD.net; aron.borok@EILTD.net; Lori Cora/R10/USEPA/US@EPA; Mark Ader/R10/USEPA/US@EPA; BBarquin@hk-law.com; audiehuber@ctuir.com; Lisa.Bluelake@grandronde.org
Cc:	LARSEN Henning; Sheila Fleming; Will Park; ROICK Tom
Subject:	RE: Arkema Groundwater Source Control
Date:	04/19/2007 10:34 AM

All,

DEQ has received the groundwater source control evaluation (SCE) from Arkema. This is the document that screens groundwater concentrations against the Joint Source Control Strategy (JSCS) screening levels values (SLVs), prioritizes (high, medium or low) groundwater for active source control management based on exceedances of SLVs and a weight of evidence evaluation, and recommends next steps. Normally, DEQ would review a SCE, modify it as necessary and carry a recommendation forward to EPA and partners for review and comment. Because of the project schedule, I am requesting EPA and interested partners review of the SCE concurrently with DEQ.

The SCE is too large to e-mail, and I am forwarding a CD copy to Sean to distribute to the EPA team. Please let me know if you are interested in reviewing the SCE, and I will forward you a copy. I would like to tentatively schedule a meeting to discuss the end of the week of May 14th (i.e., 5/17 or 5/18) and look for any partner comments prior to the meeting. Sean, I will check in with you to see if these dates work for your team.

I gave the SCE an initial read and want to pass on initial thoughts for any reviewers.

1. Arkema identifies the portion of the site that they are proposing for active groundwater source control (i.e., barrier wall and groundwater pump and treat system). This area encompasses approximately half of the site and addresses the identified Arkema groundwater plumes.
2. There are low level exceedances of SLVs in groundwater down stream of the area Arkema is proposing to actively control with their wall system. DEQ agrees that these exceedances fall into a medium priority category where additional evaluation (e.g., loading analysis to evaluate recontamination potential) or investigation may be warranted prior to concluding whether active source control is necessary. Arkema proposes an evaluation strategy that is based on MCL exceedances which DEQ does not agree with. Any weight-of-evidence evaluation will have to consider all relevant exposure endpoints.
3. DEQ will be authorizing Arkema to proceed with the focused feasibility study evaluating options for the containment wall system with the understanding that the scope of the groundwater source control efforts may expand down stream based on pending DEQ, EPA and partners discussions.
4. The SCE did not present or evaluate groundwater data obtained from push probes. There is push probe data along the top of the bank on Lots 1 and 2 which is summarizing in Appendix A of the upland RI report.
5. The monitoring well clusters RP-08, RP-09 and RP-10 were sampled by Arkema this month as part of a site-wide groundwater monitoring event. SLLI will be resampling these well clusters as part of the Rhone-Poluenc site work May 7th and 8th.
6. The upstream edge of the Rhone-Poluenc groundwater plume crosses Arkema Lots 1

and 2. The Arkema SCE does not map out the Rhone-Poluenc plume on Lots 1 and 2. Reviewers are referred to the LWG Round 2 Comp Report. If anyone needs more detail on the Rhone-Poluenc plume let me know. The projected in-river discharge area for the Rhone-Poluenc plume is downstream of the area originally identified by EPA as the preliminary Arkema early action area. Based on this, DEQ agreed to a schedule, compatible with the in-river RI/FS, with SLLI to conduct a SCE for the portion of their plume on Lots 1 and 2 followed by a groundwater source control focused feasibility study. EPA has recently expanded the potential in-river Arkema early action area to include the projected Rhone-Poluenc groundwater discharge area. This raises the potential that at least a portion of the Rhone-Poluenc groundwater plume will need to be controlled to support the Arkema in-water early action. It is DEQ's understanding that the scope of the in-water early action will not be determined until the completion of the EE/CA. DEQ would like to discuss the need to revise the Rhone-Poluenc groundwater source control schedule during the meeting on the Arkema SCE.

Please let me know if you have any questions.

Matt McClincy
Oregon Department of Environmental Quality
Northwest Region
2020 SW Fourth Ave., Suite 400
Portland, Oregon 97201-4987
Phone 503-229-5538
Fax 503-229-6945